



April 22, 2008

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
12th Street Lobby, TW-A325
Washington D.C. 20554

Re: CC Docket No. 96-45

Dear Ms. Dortch:

Virgin Mobile USA, L.P. ("Virgin Mobile") takes this opportunity to commend the Federal Communications Commission for its recent decision to conditionally designate Tracfone Wireless, Inc. ("Tracfone") as an eligible telecommunications carrier ("ETC").¹ As the Commission noted in its recent *Order*, designation of prepaid wireless providers as ETCs will provide a variety of benefits to low-income consumers, including increased consumer choice, high-quality service offerings and access to emergency services on wireless devices.² Virgin Mobile is a prepaid wireless provider that has sought ETC designation from the Commission to provide services supported by the universal service fund ("USF") to low-income customers.³ Virgin Mobile requests that the Commission expeditiously process its pending ETC applications so that it can quickly join Tracfone in providing lower-income customers with affordable wireless services.

Virgin Mobile believes that many low-income customers have yet to reap the full benefits of the intensely competitive wireless marketplace and currently lack the countless choices available to most consumers. In a deteriorating economy, many existing wireless customers have to forego wireless services because they can no longer afford them. Designation of ETC

¹ See *In the Matter of Federal-State Joint Board on Universal Service, Tracfone Wireless, Inc., Petitions for Designation in the States of Alabama, Connecticut, Delaware, Florida, Massachusetts, New Hampshire, New York, North Carolina, Pennsylvania, Tennessee, Virginia, and Washington D.C.*, Order, FCC 08-100 (rel. April 11, 2008) ("Order").

² See Order at ¶ 15.

³ To date, Virgin Mobile has sought ETC designation in the states of New York, Pennsylvania, and Virginia.



status to prepaid wireless carriers like Tracfone and Virgin Mobile should help to close the widening gap for wireless services and provide low-income customers with the significant advantages associated with access to wireless services. As noted in a recent study sponsored by the Massachusetts Institute of Technology's Legatum Center for Development and Entrepreneurship and the New Millennium Research Council, low-income customers receive significant economic and social benefits from wireless services, including enhanced productivity, increased economic opportunity, and broader access to emergency and safety services.⁴

While the Commission has justifiably focused its reform efforts on the USF's high-cost funding mechanisms, Virgin Mobile believes that the Commission should dedicate additional effort to fostering increased access by lower-income customers to telecommunications services, especially wireless services. Designation of prepaid wireless providers such as Tracfone and Virgin Mobile as ETCs is a significant first step towards ensuring that all customers, especially low-income customers, share in the many benefits associated with access to affordable wireless telecommunications services.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "P. Lurie".

Peter Lurie

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⁴ See *Cell Phones Provide Significant Economic Gains for Low-Income American Households: A Review of Literature and Data from Two New Surveys*, Nicholas P. Sullivan (April 2008).